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February 22, 2005

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements WC Docket No. 02-112; Performance Metrics and Standards for Interstate Special Access Services, CC Docket No. 01-321

Dear Ms. Dortch:

During our meeting on December 20, 2004, staff requested additional information about how each company counts orders where more than one appointment due date is missed, either for customer reasons – what Verizon calls a “customer-not-ready” situation – or for Verizon reasons. In short, if an appointment is ever missed for a Verizon reason, regardless of when in the process it occurs, Verizon counts the order as missed for Verizon reasons. Regardless of whether the order is missed for Verizon or for customer reasons, all orders are counted in the month in which Verizon completes the order. The following examples are illustrative.

If, for example, Verizon provides the customer a confirmed due date of January 21 (appointment 1), but the customer is not ready to receive service on that date, Verizon codes the order as “customer-not-ready” and reschedules the appointment, say for February 3 (appointment 2). Since the order is not completed in January, it is not counted in the January results. If Verizon is not able to complete the order on February 3, for a Verizon reason, Verizon codes the order as missed for Verizon reasons and reschedules the appointment, say for February 5 (appointment 3). Even if Verizon is able to complete the order on February 5, it counts the order as missed in its February results – i.e. the month the order was completed – because during the process, one of the appointments was missed for a Verizon reason.

Similarly, assume Verizon provides the customer a confirmed due date of January 21 (appointment 1), but Verizon is not able to complete the order on that date for a Verizon reason. Verizon codes the order as missed for a Verizon reason and reschedules the appointment, say for February 3 (appointment 2). Since the order is not completed in January, it is not counted in the

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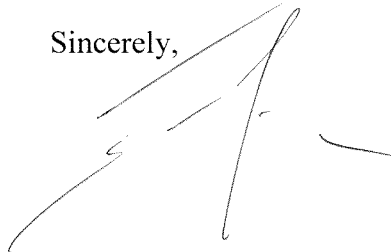
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January results. If Verizon goes out to provision the service on February 3 but the customer is not ready to receive service, Verizon places a customer-not-ready code on the order and reschedules the appointment, say for March 1 (appointment 3). Even if Verizon completes the order on March 1, it counts the order as missed in its March results – the month the order was completed – because during the process, one of the appointments was missed for a Verizon reason.

Thus, it does not matter whether it was the first appointment that was missed or the last one, if any of the appointments scheduled with the customer was missed for a Verizon reason, the order is counted as a missed appointment. The only situation in which Verizon counts a missed appointment as met is when customer not ready was the only reason the appointment was not met.

Please call me if you need any more information about this process.

Sincerely,

A handwritten signature in black ink, appearing to be 'A. Dever', written over the word 'Sincerely,'.

cc: Michael Carowitz
William Cox
William Kehoe
Pamela Megna
Bill Dever
Brad Koerner
Julie Veach